

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

MDL No. 2492

Master Docket No. 1:13-cv-09116

Judge John Z. Lee

Magistrate Judge M. David Weisman

DECLARATION OF JOHANNA SPELLMAN

I, Johanna Spellman, declare as follows:

1. I am an attorney with Latham & Watkins LLP, counsel of record for the National Collegiate Athletic Association (“NCAA”). On July 30, 2014, I was appointed by the Court as Liaison Counsel for the NCAA. I make this declaration based upon my personal knowledge, and I am competent to testify as to its contents.

2. On July 29, 2016, the NCAA sent a letter to each of its member institutions, requesting that members provide the Notice Administrator with last-known contact information for Settlement Class Members. The NCAA asked member institutions to provide the requested information by September 15, 2016.

3. On October 19, 2016, the NCAA sent a second letter to member institutions, reminding them to provide the requested information as soon as possible.

4. On December 15, 2016, the NCAA sent a third letter to member institutions that had not yet provided the Notice Administrator with last-known contact information for Settlement Class Members. In its letter, the NCAA again requested that those institutions provide the information as soon as possible and informed the institutions that if they did not comply with the request, Class Counsel would serve subpoenas for the requested information.

5. Following the NCAA's December 15, 2016 letter, Class Counsel served 385 subpoenas on member institutions that had not provided the requested information or that had requested a subpoena due to concerns about compliance with the Family Educational Rights and Privacy Act ("FERPA"). Class Counsel had previously served subpoenas on 64 member institutions that requested a subpoena due to concerns about FERPA compliance.

6. In response to the NCAA's December letter and in response to the subpoenas issued by Class Counsel, the NCAA and its counsel have responded to numerous inquiries from NCAA member institutions. From July 2016 through January 5, 2017, over 387 inquiries have been received from approximately 303 different institutions. The recent communications have further confirmed that most member institutions have been working diligently to collect and provide the requested information to the extent it is available. The Parties expect that most of the member institutions that received subpoenas will provide the requested information by January 31, 2017.

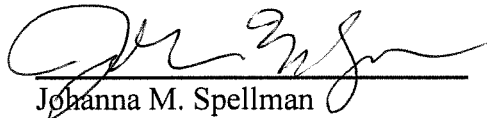
7. A handful of member institutions have contacted the NCAA's counsel and/or Class Counsel and have indicated that due to exigent circumstances, they may not be able to meet a January 31, 2017 deadline. Those institutions have, in turn, requested a further extension.

8. As of January 5, 2017, 803 NCAA member institutions have uploaded student-athlete contact information to the Notice Administrator, with a total of approximately 3,243,000 records uploaded. The number of records uploaded as of January 5, 2017 is based on information that NCAA member institutions provided when they uploaded files to the Notice Administrator. The Notice Administrator is working to verify the completeness of those records and accuracy of that number.

9. The Parties expect that direct notice will be sent to approximately 3,175,000 Settlement Class Members via U.S. mail and e-mail beginning on January 9, 2017. Additional direct notice will be sent to Settlement Class Members whose last-known contact information is provided pursuant to the subpoenas Class Counsel served in November and December of 2016.

I declare under penalty of perjury under the laws of the state of Illinois that the foregoing is true and correct.

EXECUTED on this 6th day of January, 2017, at Chicago, Illinois.



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